use and emissions. IPSC may exclude emissions increases that are caused by other factors, such as variability in control technology performance or coal characteristics. In addition, when calculating emission increases are significant, IPSC may exclude that portion of its emissions attributable to increased use at the unit due to the growth in electrical demand for the utility system as a whole since the baseline period.

In this case, to avoid the onerous burden of reporting exhaustive information for 5 years, and then attempting to delineate between emissions applicable to these modifications and those operational attributes excluded from the actuals to future actual test to prove no significant net increase, IPSC has elected to be bound by a federally enforceable permit limit to reduce the potential to emit of the facility.

For electric utility steam generating units, the post-change emission increase calculation is governed by regulations adopted in 1992 (57 Fed. Reg. 32314, July 21, 1992), commonly referred to as the "WEPCO rule," which the State of Utah has adopted. Although the WEPCO rule did not change the regulatory provision that establishes a unit's pre-change emissions, EPA announced that it would view any consecutive two-year period during the preceding five years as presumptively reflective of "normal source operations." In addition, EPA amended the regulations regarding a utility unit's post-change emissions in two ways. First, the rules allow utilities to project future emissions resulting from a particular change without committing to a permit restriction limiting the unit's potential to emit to a level below its maximum capacity to emit that pollutant, and second, provide that emissions increases independent of the physical or operational change may be discounted from the post-change emissions of the unit.

Therefore, a utility making a particular change, instead of accepting permit restrictions on the potential of the changed unit to emit a particular pollutant, may avoid PSD if its projection of "representative actual annual emissions" following the change is not significantly greater than its pre-change emissions. Conversely, if a utility accepts permit restrictions on the potential of the changed unit to emit a particular pollutant, it may avoid the tenuous task of maintaining and supplying to the DAQ substantial amounts of information that may be open to interpretation by both the facility and the agency. In determining whether an emissions increase is due to the modifications or to some excluded operational attribute, confusion and difficulty can arise in interpreting between the two. IPSC does not have to count in any emissions increase those emissions that could have been accommodated during the representative baseline period and is attributable to an increase in projected capacity utilization at the unit that is unrelated to the modifications, including any increased utilization. (Refer to EPA Region V letter of May 2000 to H. Nickel of Detroit Edison, "Dense Pack Project PSD Determination.")

Therefore, as a matter of clarity, IPSC chooses to accept a federally enforceable permit limit to limit its PTE for NO_x, SO_2, and PM_{10} from the main boilers. It will use the "actuals to future actuals" test for those other pollutants for which a permit limit does not presently exist.

II. EMISSION SUMMARY

The emissions from the entire plant (including fugitives) will be as follows:

	Current Actual Emissions	Emission Increases	Projected